

**UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND**

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**UNITED STATES OF AMERICA**

**v.**

**JOSEPH CARAMADRE, and  
RAYMOUR RADHAKRISHNAN**

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**Criminal No. 1:11-cr-00186-S**

**MOTION TO CONTINUE HEARING**

Now comes the Defendant, Joseph Caramadre, through counsel, and hereby moves this Honorable Court to continue the hearing on Defendant's motion to withdraw his guilty plea for a period of four weeks, to any date after May 20, 2013.

For reason, counsel informs the Court that due to the myriad issues, voluminous documentation, and complicated nature of this case, a brief continuance is required in order to properly complete the preparation for the hearing. Mr. Caramadre has submitted highly meritorious reasons in support of his motion to withdraw. The Government has had four years involvement with this case; Attorneys Traini and Lepizzera, who apparently will be called as witnesses by the Government, have similar familiarity with the case. Undersigned counsel has had barely two months in which to digest over 350,000 documents associated with this case, the review and analysis of which are indispensable to a proper presentation of Mr. Caramadre's claims at the hearing. Moreover, fully one week of preparation time was lost responding to the Government's unsuccessful requests to subpoena virtually the entire case file, as well as to conduct interviews with former counsel, requests which were ultimately found to be "overbroad", and denied by this Court. Furthermore, it appears that some documentation which may be important to Mr.

Caramadre's motion may have been withheld from him as "work product." A formal request has been made to present counsel for Attorneys Traini and Lepizzera for production of any such material to Mr. Caramadre. In light of these facts, fundamental fairness requires that Mr. Caramadre be given sufficient time to complete his preparation for the hearing. This is the only request to continue the hearing date, and if granted, Mr. Caramadre will not seek any further continuances.

Respectfully submitted,  
Joseph Caramadre,  
By his attorneys,

/s/ Randy Olen

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/s/ Robert D. Watt, Jr.

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**CERTIFICATION**

I hereby certify that on this 21<sup>st</sup> day of April, 2013, I caused to be delivered, via electronic delivery, the within ***Motion*** to:

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/s/ Randy Olen

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